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November 27, 1998

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Federal Communications Commission
Washington, DC 20554

RE: WT Docket 98-143

Gentlemen:

Enclosed are my comments on the proposed restructuring of Part 97 of the Commission's Rules pertaining to the Amateur Radio Service, WT Docket 98-143. I am enclosing the original and four copies, but have no computer disk.

Sincerely,


Philip E. Galasso

(Enclosure)

No. of Copies rec'd 014
List A B C D E

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:

The Proposed Restructuring
of the Amateur Radio Service

WT Docket 98-143

Background

I, Philip E. Galasso, hereby submit the following comments on the Notice of Proposed Rulemaking, WT Docket 98-143, in which the Commission proposes to streamline and restructure Part 97 of the Commission's Rules governing the Amateur Radio Service. I have been an active amateur radio operator since 1968 and hold an Amateur Extra Class license with the callsign K2PG.

Operator License Classes

In the Notice of Proposed Rulemaking ("NPRM"), WT Docket 98-143, the Commission proposes to reduce the number of amateur radio operator license classes from six to four by eliminating the Novice and Technician Plus licenses. I concur with this proposal for the reasons given by the Commission in the NPRM. I would like to propose further that the Commission eliminate the Advanced Class license by grandfathering current holders of that license into the

Amateur Extra Class and by discontinuing the issuance of any new Advanced Class licenses. This would further reduce the Commission's paperwork burden by reducing the number of license classes from six to three: Technician, General, and Amateur Extra.

Telegraphy Requirements

Technological advances in radio communications have relegated the International Morse Code to a historical curiosity. However, Morse telegraphy ("CW") is still widely used in the Amateur Radio Service, as it easily overcomes interference and, through the use of international service abbreviations ("Q Signals"), it transcends language barriers. Therefore, I believe that some proficiency in receiving the International Morse Code by ear should remain as a criterion for obtaining the General and Amateur Extra Class operator licenses. I hereby propose the following code speed requirements:

Technician Class: None

General Class: 5 WPM

Amateur Extra Class: 15 WPM

Furthermore, I would propose to allow limited Technician Class operation on bands below 30 MHz, should the International Telecommunications Union ("ITU") decide to eliminate the existing code proficiency requirement for operation on frequencies below 30 MHz. Existing Technician Plus licensees should be grandfathered into the General Class.

Frequency Allocations and Emission Subbands

In the NPRM, the Commission specifies which bands and subbands are to be made available to holders of various classes of operator license and which types of emission may be used on certain bands and subbands, per Section 97.305 of the Rules.

Regarding allocation of frequency subbands by operator class, I generally concur with the NPRM, with the following exception: Since I propose the elimination of the Advanced Class license, the present Advanced Class subbands should be made available to holders of General Class licenses. Furthermore, should the ITU eliminate the code proficiency requirement for

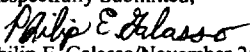
operation below 30 MHz, I propose that the *existing* General Class subbands be made available to holders of the Technician Class license.

Currently, Section 97.305 of the Commission's Rules establishes subbands reserved for certain emission types on the 80/75, 40, 20, 17, 15, 12, 10, 6, and 2 meter bands. The United States of America is one of the few countries in which the government declares which types of emission may be used in segments of certain amateur bands. The United States is also the *only* country in the world in which telephony emissions are not permitted on the 40 meter band below 7100 kHz. This severely limits the usefulness of this band at night, as powerful broadcast stations from outside ITU Region 2 saturate the frequencies from 7100 to 7300 kHz. On the 6 and 2 meter bands (50-54 and 144-148 MHz), the first 100 kHz are reserved for CW only. Since very few amateur radio operators use CW on these bands, this reservation of frequencies for one mode of emission is very wasteful of spectrum. I hereby propose that the emission types "phone", "image", "RTTY" (radioteletype), and "data" (including CW) be permitted everywhere within each amateur band and, further, that the distinction between the 80 meter band (3500-3750 kHz) and the 75 meter band (3750-4000 kHz) be eliminated. Amateur radio operators throughout the world have successfully worked out voluntary band plans for the use of certain frequency segments of each type of emission. Such band plans have also been successful on our 160 meter allocation (1800-2000 kHz). Without the current overregulation by the government, emission subbands can be tailored to changes in amateur operating practice and technological advances without the need for extensive rulemaking proceedings or requests for Special Temporary Authority ("STAs").

Enforcement

In the NPRM, the Commission asks whether enforcement of Part 97 of the Rules should be privatized. Historically, the policing of the radio spectrum has been the exclusive function of the federal government. Since privatization can breed corruption and profiteering, such enforcement should remain the exclusive province of the Commission through the CIB.

Respectfully Submitted,


Philip E. Galasso/November 25, 1998